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*Of Attorneys for Plaintiff Jacob Wakeman,
by and through his Guardian ad Litem Kristina Ensbury*

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

JACOB WAKEMAN, by and through his
Guardian ad Litem KRISTINA ENSBURY,

Case No.: 3:21-cv-00200-SB

Plaintiff,

DECLARATION OF ROBERT E.L.
BONAPARTE

v.

EAGLE WEST INSURANCE COMPANY,

Defendant.

I, ROBERT E.L. BONAPARTE, under penalty of perjury, do hereby declare:

1. I am counsel for plaintiff in the above matter.
2. I have attached as Exhibit A a true and correct copy of the certified policy of defendant in this matter.
3. I have attached as Exhibit B a true and correct copy of the Original Complaint filed on December 13, 2018 in *Wakeman v. Gaige, Gaige, and Knight*, Wasco County Circuit Court Case No. 18CV56926 (“Wasco County Case”).
4. I have attached as Exhibit C a true and correct copy of the docket for the Wasco County Case.

5. I have attached as Exhibit D a true and correct copy of Eagle West Insurance Company's letter of February 8, 2019.
6. I have attached as Exhibit E a true and correct copy of Eagle West Insurance Company's counsel's letter of March 7, 2019.
7. I have attached as Exhibit F a true and correct copy of Alexander Wylie's letter of April 5, 2019.
8. I have attached as Exhibit G a true and correct copy of the proposed Amended Complaint in the Wasco County Case that Andrew Wylie sent to Eagle West Insurance Company.
9. I have attached as Exhibit H a true and correct copy of Eagle West Insurance Company's email message of April 5, 2019.
10. I have attached as Exhibit I a true and correct copy of Eagle West Insurance Company's counsel's letter of May 1, 2019.
11. I have attached as Exhibit J a true and correct copy of the Amended Complaint in the Wasco County Case.
12. I have attached as Exhibit K a true and correct copy of the Covenant and Assignment signed July 17, 2020 and July 21, 2020.
13. I have attached as Exhibit L a true and correct copy of the Judgment in the Wasco County Case.

I HEREBY DECLARE THAT THE ABOVE STATEMENT IS TRUE TO THE BEST OF MY KNOWLEDGE AND BELIEF, AND THAT I UNDERSTAND IT IS MADE FOR USE AS EVIDENCE IN COURT AND IS SUBJECT TO PENALTY FOR PERJURY.

Executed this 2nd day of August, 2021, at Portland, Oregon.

By /s/ Robert E.L. Bonaparte
ROBERT E.L. BONAPARTE